

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE**

RON WASHINGTON,	)	
	)	
Plaintiff,	)	Case No.
	)	
v.	)	
	)	
EQUIFAX,	)	
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

Defendant, Equifax Information Services LLC (“Equifax”), incorrectly identified as Equifax, by Counsel, hereby files this Notice of Removal of this action from the General Sessions Court of Montgomery County, Tennessee, wherein it is now pending as Case No. GS2019-CV-149 to the United States District Court for the Middle District of Tennessee. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1441 and 1446. In support hereof, Defendant Equifax show this Court as follows:

1. An action was filed on January 9, 2019 in the General Sessions Court of Montgomery County, Tennessee, entitled *Washington v. Equifax*, Case No. GS2019-CV-149 (the “State Court Action”).
2. Equifax was served with the Complaint on January 19, 2019.
3. This Notice is being filed with this Court within thirty (30) days after Equifax was served with a copy of Plaintiff’s initial pleading setting forth the grounds for his action and his claims for relief.
4. This Court has original jurisdiction over this case pursuant to 28 U.S.C. § 1331, in that this is a civil action arising under the Constitution, laws or treaties of the United States;

specifically 15 U.S.C. § 1681 *et seq.*, otherwise known as the Fair Credit Reporting Act (“FCRA”), as follows:

(a) Plaintiff’s Complaint, on its face, alleges a violation of the FCRA. (See Plaintiff’s Complaint at ¶¶ 1, 2, and 46-55, attached as Exhibit A).

(b) The FCRA, pursuant to 15 U.S.C. § 1681(p), provides that any action alleging a violation of its provisions “may be brought in any appropriate United States district court without regard to the amount in controversy . . .”

5. Promptly after the filing of this Notice of Removal, Equifax shall give written notice of the removal to Plaintiff and to the Clerk of the General Sessions Court of Montgomery County, Tennessee, as required by 28 U.S.C. § 1446(d).

6. Attached hereto, as Exhibit A, are copies of the Summons and Complaint served upon Equifax in the State Court Action.

WHEREFORE, Equifax requests that the above-described action be removed to this Court.

Respectfully submitted this 15th day of February 2019.

EQUIFAX INFORMATION SERVICES LLC

/s/Katy C. Laster

Katy C. Laster (#026260)

Evans Petree PC

1715 Aaron Brenner Drive, Suite 800

Memphis, TN 38120

Tel: 901-525-6781

Fax: 901-374-7548

Email: [klaster@evanspetree.com](mailto:klaster@evanspetree.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of February 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and via U.S. Mail to:

Ron Washington  
1492 Mutual Dr.  
Clarksville, TN 37042

By: /s/Katy C. Laster  
Katy C. Laster